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August 5, 2019

**Via ECF**

The Honorable James Orenstein  
United States District Court – Eastern District of New York  
225 Cadman Plaza East, Courtroom 11D  
Brooklyn, New York 11201

Re: *Stevens Baldo & Lighty, PLLC v. Delluniversita et al.*  
Case Number 2:18-cv-01600-MKB-JO

Dear Magistrate Judge Orenstein:

My firm, Moritt Hock & Hamroff LLP, was retained today to represent Defendants Paul A. Delluniversita and Kelly Walsh (“Certain Defendants”) in the above-referenced action (“Action”). I spoke with Kenneth G. Walsh, Esq., counsel for Plaintiff Stevens Baldo & Lighty, PLLC’s (“Plaintiff”), at length this morning concerning the status of the Action. The conversation was very productive. Given my firm’s recent retention, Mr. Walsh consented to my below request to the Court for additional time to get up to speed on the Action as well as to explore the prospect of settlement. Mr. Walsh agreed to allow until mid-September for us to understand the facts and claims set forth in the Action so that my firm can properly counsel Certain Defendants.

The reason for the request for additional time is that not only will we need to learn about the Action but we will also need to review relevant facts in both *Albert P. Malvino, Representative of the Estate of Bonnie Pereida, Deceased v. Paul A. Delluniversita, et al.*, in the United States District Court for the Southern District of Texas, No. 2:12-cv-401, and in *Albert P. Malvino v. Paul A. Delluniversita*, in the New York State Court, Suffolk County, Index No. 601594/2018. In addition, we will need to talk and meet with Certain Defendants’ prior counsel to effectuate an efficient transition of the representation. Upon a preliminary review of the Docket of the Action, we have a number of questions concerning Certain Defendants’ prior legal representation in this Action which can only be answered by a thorough review of the Action and communication with prior counsel.



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We therefore respectfully request, with Plaintiff's consent, that the Court permit Certain Defendants until September 13, 2019 to accomplish these tasks as well as extend the other existing deadlines accordingly. In addition, Certain Defendants agree to extend the deadline for joinder of additional parties and amendment of pleadings through September 13, 2019.

Pursuant to Section I(A) of Your Honor's Individual Practice Rules, before filing this letter, I filed a Notice of Appearance and registered to receive ECF notifications about this Action. Additionally, pursuant to Sections I(B), I(C), and II(B), I have electronically filed this letter and have neither sent a courtesy copy by facsimile nor email to Your Honor. I understand, pursuant to Section II(C), the parties are not permitted to call chambers to request the above-identified relief. However, if Your Honor would find it advantageous, I will make myself available to participate in a conference call to discuss further.

I thank the Court for its time and consideration to the matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael Cardello III'. Below the signature, the name 'Michael Cardello III' is printed in a black, sans-serif font.

cc: Kenneth G. Walsh, Esq, Counsel for Plaintiff (via ECF and email at  
kwalsh@kgwalshlegal.com)  
Anthony J. Delluniversita, Defendant pro se (via Regular Mail at 56 Easton Avenue, North  
Babylon, NY 11703)  
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Gail A. Delluniversita, Defendant pro se (via Regular Mail at 56 Easton Avenue, North  
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Trustee Gail A. Delluniversita, Defendant pro se (via Regular Mail at 56 Easton Avenue,  
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